

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,
Plaintiff,

v.

JEFFREY DANIELS
KENNETH KILSON
Defendants.

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Criminal Action No. 08- **137-ALL**

REDACTED

INDICTMENT

The Federal Grand Jury for the District of Delaware charges that:

Count One

From on or about August 12, 2008 to on or about August 15, 2008, in the State and District of Delaware, and elsewhere, JEFFREY DANIELS and KENNETH KILSON, defendants herein, did knowingly conspire with one another and with persons known and unknown to the Grand Jury to possess with intent to distribute a controlled substance, to wit, five hundred (500) grams or more of a mixture and substance containing a detectable amount of cocaine, a violation of Title 21, United States Code, Sections 841(a)(1) & (b)(1)(B), all in violation of Title 21, United States Code, Section 846.

Count Two

On or about August 15, 2008, in the State and District of Delaware, JEFFREY DANIELS, defendant herein, did knowingly possess with the intent to distribute more than fifty (50) grams of a mixture and substance containing a detectable amount of cocaine base, a


controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).

NOTICE OF FORFEITURE

Upon conviction of the controlled substance offense alleged in Counts One and Two of this Indictment, JEFFREY DANIELS and KENNETH KILSON, defendants herein, shall forfeit to the United States pursuant to 21 U.S.C. § 853, any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of the said violations and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the said violations.

A TRUE BILL:

COLM F. CONNOLLY
United States Attorney

BY: 
Ilana H. Eisenstein
Assistant United States Attorney

Dated: *September 2, 2008*